

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#); [David McNichol](#)  
**Subject:** BERA Comments  
**Date:** Wednesday, August 15, 2012 5:28:44 PM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>, "David McNichol" <DMcNichol@ashland.com>

Hey Dave and Carrie. Below are BTAGs responses to your responses to the BERA comments. Their comments are in plain text, my commentary is in bold/italics.

Note, I went back and forth with them several times, and these seem to be the comments that need to be addressed in order for us to approve the BERA. I'm out tomorrow and Friday (i think Dave's in Maine anyway), but will be around next week to discuss the one or two which you may find troublesome.

Jon

1) Specific Comments 9, 10, 11, 12 b-e, and 29: Pursuant to ERAGS, testable risk hypotheses (risk questions), assessment endpoints, and measurement endpoints must be developed for all appropriate feeding guilds, therefore these comments remains valid. Further, contrary to the response, the Problem Formulation Document (PFD) did not indicate that these exposure pathways should be eliminated.

***I asked for clarification and BTAG responded as below.***

As per the BTAG's recommendations, additional assessment endpoints are necessary to better define the extent of contamination and risk within the aquatic (e.g. sediment) and terrestrial (e.g. soil) ecosystem. In order to develop preliminary remedial goals and remedial action objectives, EPA must have a clear understanding of the risk associated with the contaminants of concern (COCs) and their impact to the variety of trophic levels at the Site. The requested food chain modeling may result in the development of more protective PRGs which could potentially affect the selection of appropriate remedial technologies and the scope of the clean-up effort. Therefore, it is strongly recommended that the requested assessment endpoints be addressed by using site-specific data to determine the risk to these additional receptors (estuarine fish, piscivorous mammals, sediment-probing birds, insectivorous birds, carnivorous mammals and carnivorous birds).

***I think this comment (and possibly #6 below) is the only ones that may give you some agita. If this can be done without much stress, I ask that you do it. It won't substantially change the remedy one way or the other, and it allows us (me) so demonstrate that the guidance (ERAGS) was carefully followed.***

2) Specific Comments 13, 19a, 24, and 25b: "Regional Arthur Kill background" contaminant concentrations and reference location data must have BTAG concurrence,

since these contaminant levels factor quantitatively in risk characterization and contaminant delineation and remediation decisions. The location of these "regional" data (Old Place Creek) must be identified in the text as indicated in subsequent responses.

***EPA never approved of this as a reference location (or any other place as a reference location). That needs to be stated in the text when OPC is discussed.***

3) Specific Comment 19b: The response should clearly indicate that the text will be modified, as per the comment.

***Please simply modify the sentence so it notes that the higher arsenic concentrations in sediments could be due to accumulation in those depositional areas.***

4) Specific Comment 19c: The comment stands; the site may be a source of these constituents.

***I think BTAG is confused on this, in that I think what you are saying is "it doesn't matter if they're regional or site related." My response to that is if it doesn't matter then you don't need to assume the origin of the PAHs and PCDDs one way or the other.***

5) Specific Comment 21: The complete citation for Mason et al., 2006 is as follows: Mason, R.P., D. Heyes, and A. Sveinsdottir, 2006. Methylmercury Concentrations in Fish from Tidal Waters of The Chesapeake Bay, Arch. Environ. Contam. Toxicol. 51, 425–437.

***Please make this change.***

6) Specific Comment 25c: Contaminants exceedances should be included in the appropriate section of the BERA.

***Please modify the table to include all exceedances.***

7) Specific Comment 30: The published sources used to obtain dietary composition and incidental ingestion factors should be cited.

***Please include these references.***

8) Specific Comment 34: The comment remains; the statement regarding "limited support for wildlife populations" should be removed.

***Please remove the statement.***

9) Specific Comment 35: This comment remains; the statement that "exposure is likely to be only periodical" should be removed.

***Please remove the statement.***

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** Comment Letters  
**Date:** Monday, January 07, 2013 4:21:11 PM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>

Carrie, who gets the comment letters?

Please send name, current title, address, company (assume Ashland) etc.

thanks, jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#); [David McNichol](#)  
**Subject:** Follow-up to yesterday's meeting.  
**Date:** Wednesday, September 12, 2012 9:03:25 AM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>, "David McNichol" <DMcNichol@ashland.com>

Dave, Carrie, i'm not sure what happened yesterday, but when things work out well sometimes it's best not to ask too many questions.

Here's a really brief summary, please let me know if i missed anything (i'm also checking with Diana).

EPA and DEP are ok with the alternatives presented in the FS. However, some outstanding issues need to be addressed in the RI/FS and BERA.

- 1) Is the Hg contamination in the bedrock layer from GAF? (David, Diana)
- 2) ISP/Ashland want the Class IIIB criteria (i.e., surface water criteria) to be applicable at the "point of compliance" by which they mean the monitoring wells closes to the Arthur Kill. Wording needs to be prepared that is acceptable to all parties (Jon).
- 3) BTAG asked for some additional animal models to be used in the BERA. Also BTAG suggested that the PRPs assume the heron consumes a relatively higher percentage of fiddler crabs vs mummichog. This will cost the PRPs \$, so if it's unnecessary they'd rather not do it. (Mindy, Nancy)
- 4) Latest version of the RI report with the off-site ditch data needs to be forwarded to DEP. (Jon or Scott)
- 5) DEP was concerned that the sampling of SBC ended at the bulkhead. The ROD needs to contain text making it clear the actions required to implement the ROD do not mean the PRPs are no longer responsible for future actions in the Arthur Kill, etc, etc. (Jon)

Also, unrelated to this site, I will try to get the Piles Creek data from NOAA and provide it to you and DEP.

I still need Lora's ok with the latest FS changes (the COPCs especially) and need BTAG's response to #3 above. Once I get that, I'll edit the latest round of draft RI, FS and BERA comments to remove points I think we agreed on yesterday (arsenic for example) and send them as final.

Oh, one last thing, did Scott send the Dec 2011 RI to Frank F or anyone else at DEP? If so, Anne may be able to track it down.

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** FS hard copy  
**Date:** Tuesday, July 10, 2012 8:16:00 AM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>

Carrie, good seeing you yesterday.

Would you have an extra hard copy of the draft FS? The ORD person who advised me on solidification has taken an interest in the site. He would like a hard copy rather than the electronic. He's been very helpful lately, and is a lot cheaper (free right now) than CDM.

thanks, jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Cc:** [Carrie McGowan](#)  
**Subject:** Fw: 10/11/12 LCP RIR Response Document  
**Date:** Thursday, November 29, 2012 2:10:51 PM

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To: "David McNichol" <DMcNichol@ashland.com>

Cc: "Carrie McGowan" <CMcGowan@ashland.com>

Dave, Carrie, this came in soon after our call. I've only had a chance to skim it and it doesn't look too bad.

BTAG looks problematic, but will be speaking with them again next week.

No response from Diana yet, apologize.

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 11/29/2012 02:07 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "Hamill, Nancy" <Nancy.Hamill@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>, "VanEck, David" <david.vaneck@dep.state.nj.us>  
Date: 11/27/2012 10:44 AM  
Subject: 10/11/12 LCP RIR Response Document

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Jon

The NJDEP has reviewed the 10/11/12 RIR Response Document and has the following issues.

1.(p. 4) #2 Contamination Sources – inorganics should be included among contaminants related to the site and chlorine production. For example, the extraordinarily elevated Barium sediment concentrations (e.g., numerous data points approximately three orders of magnitude above the sediment ER-M of 48 mg/kg) must be addressed. At the September 11, 2012 site visit, a slide presentation by Brown and Caldwell indicated that Barium salts were part of the chloralkali process (Mercury cathode with Carbon plate anode in a Barium salt solution). Additionally, Zinc is highly elevated above the sediment screening criterion with a clear gradient in South Branch Creek, and, as previously commented by the NJDEP, upland soil data indicated highly elevated Zinc levels (in the range of 99,000-114,000 mg/kg, well above expected historic fill levels).

2. (p. 15) #44 AVS/SEM (Acid Volatile Sulfide/Simultaneously Extracted Metals) issue - pursuant to the section 6.4.10 of the EETG, while AVS/SEM is a potentially useful tool for assessing bioavailability and associated toxicity of sediment metals, it should not be used as a stand-alone line of evidence for evaluating risk until laboratory methods have been standardized to allow consistent interlaboratory reproducibility. AVS/SEM is most appropriately used to help interpret sediment toxicity test results. While AVS is effective in binding divalent metals in anoxic sediments, it is generally less applicable to the more oxic conditions in the upper 2 cm of sediments, considered the primary biotic zone (benthic organisms require oxygen and would not be present in its absence). Additionally, the AVS/SEM approach requires that the sediments are never disturbed or changed from the parameters examined to make the

ratio calculations. Therefore, SRP would not permit elevated metals to remain in sediments based on this test, since flood events, excavation, etc., cause sediment disturbance and volatile sulfide oxidation, potentially resulting in the release of a “slug” of metals to the environment.

3.(p. 16) # 50 Historic Fill issue - It remains unclear whether the RP believes that the presence of contaminants in historic fill negates remedial responsibilities. Pursuant to the section 6.4.9 of the EETG, historic fill should be considered as any other contaminant sources to an environmentally sensitive natural resource and should be investigated pursuant to N.J.A.C. 7:26E-1.16 and 4.8. If adverse ecological effects from the historic fill are documented, remediation may be required.

4. The following comment also pertains to the Historic Fill Issue. It was transmitted to EPA in May 22, 2012 (Anne Pavelka to Jon Gorin) and needs to be addressed as part of this referral.

There have been examples in past LCP reports where examples of discharges of site specific related contamination have been reported. Therefore the fill contains site related discharges. ISP has argued that with the exception of mercury, all other inorganic contamination and nearly all organic contamination are not attributable to former site operations. Listed below is documentation that there were site specific discharges, which means that there is site specific contamination in the fill.

- from the Final Work Plan dated April 12, 2001, page 1 10, Section 1.5, discuss that the typical brine sludge composition reported by LCP contains 2% metal hydroxides;
- from the Final Work Plan dated April 12, 2001, pages 1-4 and 1-5 discuss that sulfuric and hydrochloric acids were used at the LCP site in their manufacturing processes;
- if acids were accidentally discharged and / or leaked to ground surface, this would tend to create lower pH conditions in the soils and potentially mobilize metals from soils to the groundwater. Examples of such leaks are noted in the Final Work Plan dated April 12, 2001 on page 15;
- from the Final Work Plan dated April 12, 2001, page 1-7 discusses that the northern part of the LCP site was used as a laydown area for coal piles, tanks, and drums;
- from the Final Work Plan dated April 12, 2001, page 1-9, Section 1.5, cites an Eder report of the wastes generated which includes spent lubricating oils;
- from the Final Work Plan dated April 12, 2001, page 1-2 discusses former drum storage areas;
- from the Final Work Plan dated April 12, 2001, page 1-11 discusses a drum storage pad which was used to store drums of motor oil, waste oil and other lubricants;
- from the Final Report, Interim Removal Action Mercury & Demo Work, dated February 7, 2002, page 10, Section 3.5 discusses miscellaneous waste ISP disposed of, which included a drum of oil sludge.



Feel free to contact me if you have any questions.

Thanks

Anne

Anne Pavelka, PG, CHMM  
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[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Subject:** Fw: LCP Chemical - Class IIIB Criteria  
**Date:** Wednesday, June 27, 2012 2:38:51 PM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

This isn't too helpful. I want to set up a meeting with Anne and Steve Maybury at the Site in August. Maybe let us meet for a couple of hours, then join us? What do you think?

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 06/27/2012 02:36 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 06/27/2012 02:30 PM  
Subject: LCP Chemical - Class IIIB Criteria

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A while back EPA requested Class IIIB Criteria for the bedrock ground water.

The NJDEP does not have a specific procedure to develop Class IIIB criteria at this time. The NJDEP has decided that the NJ Surface Water Quality Standards for saline water should be used as the Class IIIB Criteria for the purposes of LCP bedrock ground water ARARs, since the Arthur Kill is the nearest receptor for the bedrock ground water. The more stringent of the aquatic and human health criteria should be used.

If you have any questions, feel free to contact me.

Anne Pavelka, PG, CHMM  
Case Manager  
New Jersey Department of Environmental Protection  
Bureau of Case Management  
P.O. Box 420  
Mail Code 401-05F  
Trenton, NJ 08625

609-292-3007

[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#); [McGowan, Carrie](#)  
**Subject:** Fw: LCP COPC, PRGs, and PTW  
**Date:** Thursday, August 23, 2012 12:36:14 PM

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To: "David McNichol" <DMcNichol@ashland.com>, "McGowan, Carrie" <CMcGowan@ashland.com>

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 08/23/2012 12:35 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 08/20/2012 03:02 PM  
Subject: RE: LCP COPC, PRGs, and PTW

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Jon

The NJDEP looked over the documents and has the following comments.

1. Language was added to show the elemental mercury is a principle threat waste, but some contradictory language about the risk due to the mercury. In the third page of the Nature and Extent of contamination, a PTW is defined by several terms including a highly toxic substance. However, further down in the paragraph, it states that the PTW is mitigated because there is no exposure pathway. From the definition it appears that PTW can be a highly toxic substance but does not need a complete exposure pathway. This is confusing because further on in the text free mercury is mentioned as a PTW.
2. In the 2.7.1.2 section, it states that free mercury could be a PTW. Free mercury is a toxic substance and is a PTW.
3. Note on the second page of the PTW edits document that reference to Appendix D of 7:26E is made regarding the historic fill. As of the May 7<sup>th</sup> TRSR, Appendix D has been removed and there is no longer a historic fill data table.
4. On the PRG table the units are listed as mg/kg for all compounds. The PCDF row shows a value of 1,000 and it relates to the discussions in the PTW edits document regarding the 1000 ppt (1ppb) TEQ value for dioxins/furans. The PCDF in the PRG table should have a footnote to indicate use of the TEQs and the units need to be in ppt if kept at 1,000 or the value needs to be changed from 1000 to  $1 \times 10^{-3}$  mg/kg.
5. Note that the new dioxin screening values are 50 ppt residential and either 664 or 950 ppt non-res.
6. Based on previous discussions the NJ Surface Water Quality Standards (SWQS) are the ARARs for the bedrock GW. Based on the discussion under GW ARARS it states that the SWQS are ARARs for only a portion of the bedrock GW plume discharging to the Arthur Kill. Since there are no Class IIIB standards, the SWQS apply to all bedrock GW.

Thanks

Anne

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]

**Sent:** Tuesday, August 14, 2012 2:55 PM

**To:** Pavelka, Anne

**Subject:** Fw: LCP COPC, PRGs, and PTW

Hi Anne, here's are some modifications the PRPs have suggested for the FS. Note, these are draft and i've not accepted them, i'm sending them to you to forward to the rest of the group for discussion purposes.

If anyone has concerns, please let me know.

thanks, jon

ps, i'm out thurs and fri, but will be back on Monday

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#); [McNichol, David](#)  
**Subject:** Fw: Mercury contaminated sites - solidification  
**Date:** Friday, June 22, 2012 3:15:46 PM

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To: "McGowan, Carrie" <CMcGowan@ashland.com>, "McNichol, David" <DMcNichol@ashland.com>

Dave, after several days of going back and forth with EPA HQ and ORD, the person who knows the most (Dr Barth) has decreed we (i.e., you) should "rule out solidification." See below. The final comments won't include the one about retaining solidification.

Gary, as usual, is right.

I haven't forgot the BERA comments - will find time next week (i hope).

have a pleasant weekend, jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 06/22/2012 03:11 PM -----

From: Ed Barth/CI/USEPA/US  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 06/22/2012 03:03 PM  
Subject: Re: Mercury contaminated sites - solidification

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Jon, good catch, I had almost given up explaining the difference between stabilization and solidification! But with that said, stabilized waste might be liquid-like, so it might not pass paint filter. If the stabilizing agent results in a solid, yes rule out solidification!

Edwin F. Barth, Ph.D, P.E., C.I.H., R.S.  
Office of Research and Development  
U.S. Environmental Protection Agency  
26 W. Martin Luther King Drive  
Cincinnati, OH 45268  
Telephone: (513)-569-7669  
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E-mail: [barth.ed@epa.gov](mailto:barth.ed@epa.gov)

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](mailto:David.McNichol@ashland.com)  
**Subject:** Fw: Planning input for utility mark outs and survey along the RR tracks  
**Date:** Thursday, September 27, 2012 3:37:15 PM

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To: "David McNichol" <DMcNichol@ashland.com>


----- Forwarded by Jonathan Gorin/R2/USEPA/US on 09/27/2012 03:37 PM -----

From: Jonathan Gorin/R2/USEPA/US  
To: Chuck\_Terbot@praxair.com  
Date: 09/26/2012 05:07 PM  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

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thanks Chuck, that doesn't look like it will be a problem, especially as the dirt won't be disturbed. If you plan on taking off the clippings/chips i'll need to approve the facility (even for non-haz stuff).

jon

 Chuck\_Terbot---09/26/2012 04:57:14 PM---Reference push pins in map below. There would be no dirt disturbance. regards,

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/26/2012 04:57 PM  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

---

Reference push pins in map below. There would be no dirt disturbance.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
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Tonawanda, NY 14150-7891

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Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>

To: Chuck\_Terbot@praxair.com

09/26/2012 04:43 PM

cc  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

Chuck, i'll check a map tomorrow to get a better sense of where you want to clear. If it's just grass that can be "whacked" and left in place, i don't think there's a problem, same as trees that need to be shredded. If you're removing roots/soils that may be a problem, which we can figure out.

jon

From: Chuck\_Terbot@praxair.com

To: "McNichol, David" <DMcNichol@ispcorp.com>, Jonathan Gorin/R2/USEPA/US@EPA

Cc: dbove@ispcorp.com, "Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>

Date: 09/26/2012 04:26 PM

Subject: Planning input for utility mark outs and survey along the RR tracks

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Dave,

I would like to get your input on few things below. Jon, can you weigh in on item 1A?

1. I am currently getting ready to request some quotes to clear out the brush (weed whackers and saws, maybe a chipper/shredder) on the east side of the tracks from Grasselli down to your road crossing for the water treatment building. Do you foresee any special requirements that would need to be addressed as part of this work scope? I want to clear the area, so I can get the utilities marked out and surveyed ahead of the N2 pipe replacement. This effort would also facilitate item 2 below. I would also be interested in knowing if you have any old GAF drawings that might provide some insight on plant utilities that may have crossed the tracks.

1A. I also would like to clear the brush on both sides of the track from the security gate (across the tracks) by the LCP cooling towers, south east to where our nitrogen line crosses into the property to facilitate utility mark outs and survey. Nothing that would disturb the dirt. Would there be any special requirements here? It will take a day with 2-3 men.

2. Do you have any representative soil or groundwater data from the surface down to 4 feet along the RR track through the ISP property about 20 feet east of track centerline? If you do not, would there be any issues in my making some arrangements to collect samples? The attachment below references the A449 sample matrix we used for the rectifier work. I would also get water samples (metals, TOC, COD) per the recommendations you gave me when I had to dig at the south east tip of LCP.

3. On a typical pipeline project we would proactively sample every 500 feet. For this effort I'm wondering

if 300 feet might be more adequate. Would you have any recommendations based on your site knowledge?

4. I am still working on the piping plan through LCP. I did manage to overlay one of Jon's contamination maps into Google Earth to match it up with the existing pipe and proposed new pipe. Just need less distractions here at the office to complete it.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891  
"Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>

To <Chuck\_Terbot@praxair.com>

10/13/2008 05:54 PM

cc  
SubjectFW: A449 Praxair results

Chuck

Attached are the results. We are good, all below Direct Contact Standards

Thanks

Bill

**Bill Schnitzerling**  
Client Program Manager  
Shaw Environmental and Infrastructure Group  
105 Fieldcrest Avenue  
Edison, NJ 08837  
732-346-2918 (Direct)  
732-346-2901 (Fax)

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**From:** Kelly, Joy [<mailto:Joy.Kelly@testamericainc.com>]  
**Sent:** Monday, October 13, 2008 4:58 PM  
**To:** Schnitzerling, Bill; Foley, Rachel  
**Subject:** A449 Praxair results

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The Shaw Group Inc.  
<http://www.shawgrp.com> [attachment "newExcelTemp1.xls" deleted by Jonathan Gorin/R2/USEPA/US]

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](mailto:David.McNichol@ashland.com)  
**Subject:** Fw: Planning input for utility mark outs and survey along the RR tracks  
**Date:** Thursday, September 27, 2012 3:37:32 PM

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To: "David McNichol" <DMcNichol@ashland.com>

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 09/27/2012 03:37 PM -----

From: Jonathan Gorin/R2/USEPA/US  
To: Chuck\_Terbot@praxair.com  
Cc: "Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>  
Date: 09/27/2012 08:51 AM  
Subject: Re: Fw: Planning input for utility mark outs and survey along the RR tracks

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Bill, Chuck, just to be clear, this merely means when you have selected a facility to accept the waste, send me the name with a description of the waste. I have to run that by a reviewer here for the ok. In theory a facility can be barred from accepting waste from a superfund site. In reality, i've never seen an operating facility denied, so it shouldn't be an issue.

jon

 [Chuck\\_Terbot---09/27/2012 08:34:05 AM---Bill, FYI, below note. For any disposal related work on the LCP property,](#)

From: Chuck\_Terbot@praxair.com  
To: "Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>  
Cc: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/27/2012 08:34 AM  
Subject: Fw: Planning input for utility mark outs and survey along the RR tracks

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Bill,

FYI, below note. For any disposal related work on the LCP property, Praxair will need to defer to the EPA approved waste disposal facilities. Please account for this when building the cost estimates.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

----- Forwarded by Chuck Terbot/USA/NA/Praxair on 09/27/2012 08:25 AM -----

**Jonathan Gorin** <[Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)>

To: [Chuck\\_Terbot@praxair.com](mailto:Chuck_Terbot@praxair.com)

09/26/2012 05:07 PM

cc  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

thanks Chuck, that doesn't look like it will be a problem, especially as the dirt won't be disturbed. If you plan on taking off the clippings/chips i'll need to approve the facility (even for non-haz stuff).

jon

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/26/2012 04:57 PM  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

---

Reference push pins in map below. There would be no dirt disturbance.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

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Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>

To: Chuck\_Terbot@praxair.com

09/26/2012 04:43 PM

cc  
Subject: Re: Planning input for utility mark outs and survey along the RR tracks

Chuck, i'll check a map tomorrow to get a better sense of where you want to clear. If it's just grass that can be "whacked" and left in place, i don't think there's a problem, same as trees that need to be shredded. If you're removing roots/soils that may be a problem, which we can figure out.

jon

From: Chuck\_Terbot@praxair.com  
To: "McNichol, David" <DMcNichol@ispcorp.com>, Jonathan Gorin/R2/USEPA/US@EPA  
Cc: dbove@ispcorp.com, "Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>  
Date: 09/26/2012 04:26 PM  
Subject: Planning input for utility mark outs and survey along the RR tracks

---

Dave,

I would like to get your input on few things below. Jon, can you weigh in on item 1A?

1. I am currently getting ready to request some quotes to clear out the brush (weed whackers and saws, maybe a chipper/shredder) on the east side of the tracks from Grasselli down to your road crossing for the water treatment building. Do you foresee any special requirements that would need to be addressed as part of this work scope? I want to clear the area, so I can get the utilities marked out and surveyed ahead of the N2 pipe replacement. This effort would also facilitate item 2 below. I would also be interested in knowing if you have any old GAF drawings that might provide some insight on plant utilities that may have crossed the tracks.

1A. I also would like to clear the brush on both sides of the track from the security gate (across the tracks) by the LCP cooling towers, south east to where our nitrogen line crosses into the property to facilitate utility mark outs and survey. Nothing that would disturb the dirt. Would there be any special requirements here? It will take a day with 2-3 men.

2. Do you have any representative soil or groundwater data from the surface down to 4 feet along the RR track through the ISP property about 20 feet east of track centerline? If you do not, would there be any issues in my making some arrangements to collect samples? The attachment below references the A449 sample matrix we used for the rectifier work. I would also get water samples (metals, TOC, COD) per the recommendations you gave me when I had to dig at the south east tip of LCP.

3. On a typical pipeline project we would proactively sample every 500 feet. For this effort I'm wondering if 300 feet might be more adequate. Would you have any recommendations based on your site knowledge?

4. I am still working on the piping plan through LCP. I did manage to overlay one of Jon's contamination maps into Google Earth to match it up with the existing pipe and proposed new pipe. Just need less distractions here at the office to complete it.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891  
"Schnitzerling, Bill" <Bill.Schnitzerling@shawgrp.com>

To <Chuck\_Terbot@praxair.com>

10/13/2008 05:54 PM

cc  
SubjectFW: A449 Praxair results

Chuck

Attached are the results. We are good, all below Direct Contact Standards

Thanks

Bill

**Bill Schnitzerling**  
Client Program Manager  
Shaw Environmental and Infrastructure Group  
105 Fieldcrest Avenue  
Edison, NJ 08837  
732-346-2918 (Direct)  
732-346-2901 (Fax)

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**From:** Kelly, Joy [<mailto:Joy.Kelly@testamericainc.com>]  
**Sent:** Monday, October 13, 2008 4:58 PM  
**To:** Schnitzerling, Bill; Foley, Rachel  
**Subject:** A449 Praxair results

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---

The Shaw Group Inc.  
<http://www.shawgrp.com> [attachment "newExcelTemp1.xls" deleted by Jonathan Gorin/R2/USEPA/US]

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](mailto:David.McNichol@ashland.com)  
**Subject:** Fw: Planning input for utility mark outs and survey along the RR tracks  
**Date:** Thursday, September 27, 2012 4:09:46 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 09/27/2012 04:09 PM -----

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/27/2012 04:04 PM  
Subject: Re: Fw: Planning input for utility mark outs and survey along the RR tracks

---

I am planning on using a third party health and safety officer to monitor conditions and provide unbiased environmental oversight. Most likely this person would come from Shaw or AECOM. I also have them prepare the HASP. I could sub your contractor through this third party, or get them qualified with my procurement group and pay them directly if I need to use them.

Everyone currently working as part of the Praxair team, including myself is up to date with the Hazwoper training. I do not anticipate any new members to the crew at this point, but they would be trained.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

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Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>

To: Chuck\_Terbot@praxair.com

09/27/2012 03:40 PM

CC: "David McNichol" <DMcNichol@ashland.com>

Subject: Re: Fw: Planning input for utility mark outs and survey along the RR tracks

Chuck, one more issue. I'll need someone to oversee this work. I have a contractor, but no real mechanism to have you reimburse us for those costs. I'll try to figure this out before you're ready to do work.

Also, Dave pointed out, correctly, that you'll likely need workers with 40hrs Hazwoper training.

jon



**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Fw: Tax map  
**Date:** Tuesday, October 16, 2012 3:20:09 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

Dave, typo in my cc to you. second try

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 10/16/2012 03:14 PM -----

From: Jonathan Gorin/R2/USEPA/US  
To: Frank Cardiello/R2/USEPA/US@EPA  
Cc: "McGowan, Carrie" <cmcgowan@gaf.com>, dmicnichol@ashland.com  
Date: 10/16/2012 03:13 PM  
Subject: Fw: Tax map

---

Frank, sorry about the never ending questions on this, a new one - it seems like parts of the pipeline are and will be on Conrail property. See my e-mail to Mr Terbot and his response below.

I guess if he can show evidence that Conrail knows what they're up to, it's fine with us.

What do you think?

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 10/16/2012 03:11 PM -----

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 10/16/2012 02:15 PM  
Subject: Re: Fw: Tax map

---

Jon,

I have that same tax map. Praxair has ROW maintenance agreements in place with Conrail to keep the pipeline markers and appurtenances visible and refreshed. Historically the railroad would keep the vegetation cleared, but today any tracks that aren't in service are not addressed, so now the pipeline companies have to address this. For areas where there are operating tracks we file an entry permit request with the railroad to coordinate timing, flagmen, etc for any inspection or above grade work we need to do. Praxair performs waste disposal with reference to the RR property ID's. We have Shaw environmental do this. Praxair indemnifies the railroad for everything related to our pipelines, even if Conrail damages the lines.

In the area south of LCP the nitrogen line is on the edge of that sliver of Conrail property. Also, the proposed area for the new pipeline will be entirely on the LCP property. I have a legal metes and bounds for this sliver of property. It was part of a railroad project several years ago to bring the ethanol in to the Citgo terminal. I spent a lot of money on surveyors researching that problem to get it right.

However, the spur track from the Citgo terminal all the way up to the Chemical coast is exclusively leased by Conrail to LTT for 50 years. Any interruptions regarding to track operations have to be coordinated

with them. We won't be interrupting their operations.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

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Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>

To: Chuck\_Terbot@praxair.com

10/16/2012 12:33 PM

cc: CMcGowan@ashland.com, "David McNichol"  
<DMcNichol@ashland.com>

Subject: Fw: Tax map

Hi Chuck, earlier today Dave, Carrie and I walked the area you want to clear. It doesn't look like there will be a problem with the vegetation clearing from a H&S standpoint. I'd like to oversee the work so it would be helpful if we could have that AOC signed before work begins, and also, ISP/Ashland wants the waste vegetation to go off-site as we discussed.

I don't think either one of those is a major issue. However, Dave and Carrie found a tax map (attached) that seems to indicate the area you're working on is owned by Conrail. That may be a big headache for you. I don't know if Conrail even knows about it, but I will have to let them know.

Jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 10/16/2012 12:27 PM -----

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 10/16/2012 11:11 AM  
Subject: Tax map

---

Jon,  
As requested.  
Carrie

---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** got your message  
**Date:** Tuesday, November 20, 2012 11:10:24 AM

---

To: "David McNichol" <DMcNichol@ashland.com>

Dave, i'm in... coincidentally, i was done with Frank discussing Praxair. I still haven't got final confirmation from DEP, nor got confirmation from BTAG. So, next week or the week after, i'll just send you the comments you've already seen, with a few minor adjustments.

I'll be away from my desk a lot of today, so if you want to discuss things further, let me know and i'll give you a buzz.

Otherwise, have a pleasant holiday as well.

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Subject:** LCP meeting with DEP  
**Date:** Monday, July 02, 2012 3:39:31 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

Carrie, Dave, DEP cannot meet until Sept. Here's the dates they have open: Sept 7, 14 and 25

Any preference?

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Cc:** [Cardiello.Frank@epamail.epa.gov](mailto:Cardiello.Frank@epamail.epa.gov)  
**Subject:** Other PRPs  
**Date:** Friday, October 12, 2012 11:52:55 AM

---

To: "David McNichol" <DMcNichol@ashland.com>

Cc: Cardiello.Frank@epamail.epa.gov

Hey Dave, Frank can't make it on Tues. He said you or your attorney can call him to discuss the PRPs at anytime.

His number is 212 637-3148 and he's cc'd above.

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: 10/11/12 LCP RIR Response Document  
**Date:** Tuesday, December 11, 2012 3:26:51 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Carrie, please call me when you get a chance

212 637 4361

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: 10/11/12 LCP RIR Response Document  
**Date:** Wednesday, December 12, 2012 8:31:57 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

I'm in until 10, then a meeting until 2... can i call you after 2?

if so, which #

 "McGowan, Carrie" ---12/11/2012 06:26:19 PM---Jon - I just got home from refresher training. Are you in tomorrow? C

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 12/11/2012 06:26 PM  
Subject: RE: 10/11/12 LCP RIR Response Document

---

Jon – I just got home from refresher training. Are you in tomorrow?

C

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Tuesday, December 11, 2012 3:27 PM  
**To:** McGowan, Carrie  
**Subject:** RE: 10/11/12 LCP RIR Response Document

Carrie, please call me when you get a chance

212 637 4361

jon

---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [David McNichol](#)  
**Subject:** RE: 10/11/12 LCP RIR Response Document  
**Date:** Thursday, November 29, 2012 2:58:02 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "David McNichol" <DMcNichol@ashland.com>

Carrie, i'm on a call - when i get off (an hour or so) i'll call you.

let me know the number i can reach you.

 "McGowan, Carrie" ---11/29/2012 02:49:00 PM---Jon,

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>  
Date: 11/29/2012 02:49 PM  
Subject: RE: 10/11/12 LCP RIR Response Document

---

Jon,

We should discuss these as it is unclear what response would be needed to these comments. Many of these issues have been discussed numerous times. For instance in number (1.) we have repeatedly said that barium was used on site and it is addressed in the documents. No where do we say that barium will not be addressed in the sediments. However as you know barium is not much of an ecological concern so it will be addressed when we address the mercury and other contaminant issues in SBC. Zinc is not a site contaminant and elevated detections on-site do not change the fact. We did not ignore those detections however - we have always included maps showing any contaminant detected above the non-res standards.

And as for the historic fill comments I am just exhausted. The beginning of comment 3. is frankly insulting. I do not know how we could be clearer. And all of #4 is information we supplied. Clearly we are not hiding the operational history of the site by any of the operators. The fact remains that many contaminants present onsite are due to historic fill being placed on-site. We have never said that we are not including historic fill areas in our remedial plans.

Lets schedule a call to discuss how these comments affect the final RIR and the progress moving forward.

Carrie

---

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Thu 11/29/2012 2:10 PM  
**To:** David McNichol  
**Cc:** McGowan, Carrie  
**Subject:** Fw: 10/11/12 LCP RIR Response Document

Dave, Carrie, this came in soon after our call. I've only had a chance to skim it and it doesn't look too bad.

BTAG looks problematic, but will be speaking with them again next week.

No response from Diana yet, apologize.

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 11/29/2012 02:07 PM -----

From: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "Hamill, Nancy" <Nancy.Hamill@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>, "VanEck, David" <david.vaneck@dep.state.nj.us>  
Date: 11/27/2012 10:44 AM  
Subject: 10/11/12 LCP RIR Response Document

---

Jon

The NJDEP has reviewed the 10/11/12 RIR Response Document and has the following issues.

1.(p. 4) #2 Contamination Sources – inorganics should be included among contaminants related to the site and chlorine production. For example, the extraordinarily elevated Barium sediment concentrations (e.g., numerous data points approximately three orders of magnitude above the sediment ER-M of 48 mg/kg) must be addressed. At the September 11, 2012 site visit, a slide presentation by Brown and Caldwell indicated that Barium salts were part of the chloralkali process (Mercury cathode with Carbon plate anode in a Barium salt solution). Additionally, Zinc is highly elevated above the sediment screening criterion with a clear gradient in South Branch Creek, and, as previously commented by the NJDEP, upland soil data indicated highly elevated Zinc levels (in the range of 99,000-114,000 mg/kg, well above expected historic fill levels).

2. (p. 15) #44 AVS/SEM (Acid Volatile Sulfide/Simultaneously Extracted Metals) issue - pursuant to the section 6.4.10 of the EETG, while AVS/SEM is a potentially useful tool for assessing bioavailability and associated toxicity of sediment metals, it should not be used as a stand-alone line of evidence for evaluating risk until laboratory methods have been standardized to allow consistent interlaboratory reproducibility. AVS/SEM is most appropriately used to help interpret sediment toxicity test results. While AVS is effective in binding divalent metals in anoxic sediments, it is generally less applicable to the more oxic conditions in the upper 2 cm of sediments, considered the primary biotic zone (benthic organisms require oxygen and would not be present in its absence). Additionally, the AVS/SEM approach requires that the sediments are never disturbed or changed from the parameters examined to make the ratio calculations. Therefore, SRP would not permit elevated metals to remain in sediments based on this test, since flood events, excavation, etc., cause sediment disturbance and volatile sulfide oxidation, potentially resulting in the release of a "slug" of metals to the environment.

3.(p. 16) # 50 Historic Fill issue - It remains unclear whether the RP believes that the presence of contaminants in historic fill negates remedial responsibilities. Pursuant to the section 6.4.9 of the EETG, historic fill should be considered as any other contaminant sources to an environmentally sensitive natural resource and should be investigated pursuant to N.J.A.C. 7:26E-1.16 and 4.8. If adverse ecological effects from the historic fill are documented, remediation may be required.

4. The following comment also pertains to the Historic Fill Issue. It was transmitted to EPA in May 22, 2012 (Anne Pavelka to Jon Gorin) and needs to be addressed as part of this referral.

There have been examples in past LCP reports where examples of discharges of site specific related contamination have been reported. Therefore the fill contains site related discharges. ISP has argued that with the exception of mercury, all other inorganic contamination and nearly all organic contamination are not attributable to former site operations. Listed below is documentation that there were site specific discharges, which means that there is site specific contamination in the fill.

- from the Final Work Plan dated April 12, 2001, page 1 10, Section 1.5, discuss that the typical brine sludge composition reported by LCP contains 2% metal hydroxides;
- from the Final Work Plan dated April 12, 2001, pages 1-4 and 1-5 discuss that sulfuric and hydrochloric acids were used at the LCP site in their manufacturing processes;
- if acids were accidentally discharged and / or leaked to ground surface, this would tend to create lower pH conditions in the soils and potentially mobilize metals from soils to the groundwater. Examples of such leaks are noted in the Final Work Plan dated April 12, 2001 on page 15;
- from the Final Work Plan dated April 12, 2001, page 1-7 discusses that the northern part of the LCP site was used as a laydown area for coal piles, tanks, and drums;
- from the Final Work Plan dated April 12, 2001, page 1-9, Section 1.5, cites an Eder report of the wastes generated which includes spent lubricating oils;
- from the Final Work Plan dated April 12, 2001, page 1-2 discusses former drum storage areas;
- from the Final Work Plan dated April 12, 2001, page 1-11 discusses a drum storage pad which was used to store drums of motor oil, waste oil and other lubricants;
- from the Final Report, Interim Removal Action Mercury & Demo Work, dated February 7, 2002, page 10, Section 3.5 discusses miscellaneous waste ISP disposed of, which included a drum of oil sludge.

Feel free to contact me if you have any questions.

Thanks

Anne

Anne Pavelka, PG, CHMM  
Case Manager  
New Jersey Department of Environmental Protection  
Bureau of Case Management  
P.O. Box 420  
Mail Code 401-05F  
Trenton, NJ 08625

609-292-3007

[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Subject:** RE: bedrock GW criteria  
**Date:** Tuesday, May 29, 2012 9:48:54 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

Sounds good. Weekend was restful, hope yours was as well.

jon

 "McGowan, Carrie" ---05/29/2012 09:46:25 AM---Jon, We are meeting with our consultants the end of this week to go over everything we covered last

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, "McNichol, David" <DMcNichol@ashland.com>  
Date: 05/29/2012 09:46 AM  
Subject: RE: bedrock GW criteria

---

Jon,

We are meeting with our consultants the end of this week to go over everything we covered last week.

We wanted to do that prior to sending out the email.

Hope you had a nice long weekend!

C

---

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Tue 5/29/2012 9:42 AM  
**To:** McNichol, David  
**Cc:** McGowan, Carrie  
**Subject:** bedrock GW criteria

Carrie, Dave, could you try to get an e-mail to Anne requesting assistance developing the alt criteria. It appears she's already looking into this, and asked for an e-mail from you with the request (i realize you've already made a request two years ago).

thanks, jon

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [John M. Hoffman](#)  
**Subject:** RE: Comment Letters  
**Date:** Wednesday, January 09, 2013 10:47:09 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "John M. Hoffman" <jmhoffman@ashland.com>

Woops, forgot about the RI.

Let me take a look at the remaining comments - if they're not vital or will be addressed through the FS comments, i'll simply approve it with the letter on the off-site ditch work.

If they need more time for the BERA, not a problem.

 "McGowan, Carrie" ---01/09/2013 10:39:52 AM---Jon, OK on the BERA but I am not sure they can do the modeling and revise the

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <jmhoffman@ashland.com>  
Date: 01/09/2013 10:39 AM  
Subject: RE: Comment Letters

---

Jon,

OK on the BERA but I am not sure they can do the modeling and revise the report in 30 days. I will contact Geosyntec.

Ok on the offsite ditch.

OK on the FS.

What about the RI? There are still outstanding comments.

Carrie

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Wednesday, January 09, 2013 9:15 AM  
**To:** McGowan, Carrie  
**Cc:** John M. Hoffman  
**Subject:** RE: Comment Letters

Ok, thanks. Here's how it looks like it's going to go.

You'll get a letter with the remaining comments on the BERA. This letter will ask that other species be modelled. We discussed this at the meeting, and BTAG remains adamant. It follows RAGs so it's the right thing to do. i told that to Dave hopefully he relayed the info. Once that's done, the BERA is approvable - i'm asking for the revised BERA by Feb. 15 (ok?).

You'll get a short approval letter for the off-site ditch RI work, contingent on some very minor changes. All you need to do is send in the final copy with a cover letter indicating the changes were made.

You'll get a letter with the FS comments. The comments we've been discussing, the ones you've seen previously in draft. Nothing in that letter is new and just about all of the comments have been addressed by Gary either through draft changes to the text or through discussions. So why am i resending them? I think it would be best to have a paper trail of official letters showing the comments, and then a final document/cover letter showing the responses. This information will become part of the Admin Record.

I hope to get the BERA letter out today, the rest shall follow.

jon

From: "McGowan, Carrie" <[CMcGowan@ashland.com](mailto:CMcGowan@ashland.com)>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <[jmhoffman@ashland.com](mailto:jmhoffman@ashland.com)>  
Date: 01/08/2013 09:48 AM  
Subject: RE: Comment Letters

---

Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

500 Hercules Road

Wilmington, DE 19808-1599

302-995-3485

He is copied on this email so you also have his email address.

And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

Thanks,

Carrie

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov) [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Monday, January 07, 2013 4:21 PM  
**To:** McGowan, Carrie  
**Subject:** Comment Letters

Carrie, who gets the comment letters?

Please send name, current title, address, company (assume Ashland) etc.

thanks, jon

---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [John M. Hoffman](#)  
**Subject:** RE: Comment Letters  
**Date:** Wednesday, January 09, 2013 10:47:09 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "John M. Hoffman" <jmhoffman@ashland.com>

Woops, forgot about the RI.

Let me take a look at the remaining comments - if they're not vital or will be addressed through the FS comments, i'll simply approve it with the letter on the off-site ditch work.

If they need more time for the BERA, not a problem.

 "McGowan, Carrie" ---01/09/2013 10:39:52 AM---Jon, OK on the BERA but I am not sure they can do the modeling and revise the

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <jmhoffman@ashland.com>  
Date: 01/09/2013 10:39 AM  
Subject: RE: Comment Letters

---

Jon,

OK on the BERA but I am not sure they can do the modeling and revise the report in 30 days. I will contact Geosyntec.

Ok on the offsite ditch.

OK on the FS.

What about the RI? There are still outstanding comments.

Carrie

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Wednesday, January 09, 2013 9:15 AM  
**To:** McGowan, Carrie  
**Cc:** John M. Hoffman  
**Subject:** RE: Comment Letters

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You'll get a letter with the FS comments. The comments we've been discussing, the ones you've seen previously in draft. Nothing in that letter is new and just about all of the comments have been addressed by Gary either through draft changes to the text or through discussions. So why am i resending them? I think it would be best to have a paper trail of official letters showing the comments, and then a final document/cover letter showing the responses. This information will become part of the Admin Record.

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From: "McGowan, Carrie" <[CMcGowan@ashland.com](mailto:CMcGowan@ashland.com)>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "John M. Hoffman" <[jmhoffman@ashland.com](mailto:jmhoffman@ashland.com)>  
Date: 01/08/2013 09:48 AM  
Subject: RE: Comment Letters

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Jon,

The PM for Ashland will be:

John Hoffman

Project Manager

Ashland Inc.

EH&S, Remediation

500 Hercules Road

Wilmington, DE 19808-1599

302-995-3485

He is copied on this email so you also have his email address.

And John – you now have the email address of Jon Gorin – the EPA RPM for LCP!

Thanks,

Carrie

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov) [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
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Please send name, current title, address, company (assume Ashland) etc.

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---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [DiPippo.Gary](mailto:DiPippo.Gary)  
**Cc:** [Carrie McGowan](mailto:Carrie.McGowan); [David McNichol](mailto:David.McNichol)  
**Subject:** Re: Draft Agenda, September 11, 2012 meeting  
**Date:** Monday, August 27, 2012 8:12:13 AM

---


To: "DiPippo, Gary" <Gary.DiPippo@Cornerstoneeg.com>

Cc: Carrie McGowan <CMcGowan@ashland.com>, David McNichol <DMcNichol@ashland.com>

Hey Gary, sorry i didn't get back to you on Fri, i was out.

The agenda looks fine.

thanks, jon

 "DiPippo, Gary" ---08/24/2012 04:47:12 PM---Good afternoon Jon. Dave asked that I send this draft agenda to you for review, as a planning tool f

From: "DiPippo, Gary" <Gary.DiPippo@Cornerstoneeg.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: David McNichol <DMcNichol@ashland.com>, Carrie McGowan <CMcGowan@ashland.com>  
Date: 08/24/2012 04:47 PM  
Subject: Draft Agenda, September 11, 2012 meeting

---

Good afternoon Jon.

Dave asked that I send this draft agenda to you for review, as a planning tool for the meeting in September.

Please let us know if you have comments on or suggestions for the agenda.

Thanks and have a good weekend, Gary

Gary J. DiPippo, P.E.

Cornerstone Environmental Group, LLC

90 Crystal Run Road

Suite 201

Middletown, NY 10941

845-695-0251

845-692-5894 (fax)

973-809-2581 (cell)

[gary.dipippo@cornerstoneeg.com](mailto:gary.dipippo@cornerstoneeg.com)

[attachment "091112 LCP draft meeting agenda.docx" deleted by Jonathan Gorin/R2/USEPA/US]

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [DiPippo.Gary](mailto:DiPippo.Gary)  
**Cc:** [Carrie McGowan](mailto:Carrie.McGowan); [David McNichol](mailto:David.McNichol)  
**Subject:** RE: Draft Agenda, September 11, 2012 meeting  
**Date:** Monday, August 27, 2012 8:16:22 AM

---

To: "DiPippo, Gary" <[Gary.DiPippo@Cornerstoneeg.com](mailto:Gary.DiPippo@Cornerstoneeg.com)>

Cc: Carrie McGowan <[CMcGowan@ashland.com](mailto:CMcGowan@ashland.com)>, David McNichol <[DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)>

Gary, yes, please send it out as final. If there's an additional item they need, they'll let us know.

jon

 "DiPippo, Gary" ---08/27/2012 08:14:23 AM---No worries Jon. Not a rush. Would you like me to send a copy without draft on it?

From: "DiPippo, Gary" <[Gary.DiPippo@Cornerstoneeg.com](mailto:Gary.DiPippo@Cornerstoneeg.com)>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: Carrie McGowan <[CMcGowan@ashland.com](mailto:CMcGowan@ashland.com)>, David McNichol <[DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)>  
Date: 08/27/2012 08:14 AM  
Subject: RE: Draft Agenda, September 11, 2012 meeting

---

No worries Jon. Not a rush.

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Thanks, Gary

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Monday, August 27, 2012 8:12 AM  
**To:** DiPippo, Gary  
**Cc:** Carrie McGowan; David McNichol  
**Subject:** Re: Draft Agenda, September 11, 2012 meeting

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Cc: David McNichol <[DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)>, Carrie McGowan <[CMcGowan@ashland.com](mailto:CMcGowan@ashland.com)>

Date: 08/24/2012 04:47 PM

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Good afternoon Jon.

Dave asked that I send this draft agenda to you for review, as a planning tool for the meeting in September.

Please let us know if you have comments on or suggestions for the agenda.

Thanks and have a good weekend, Gary

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[gary.dipippo@cornerstoneeg.com](mailto:gary.dipippo@cornerstoneeg.com)

[attachment "091112 LCP draft meeting agenda.docx" deleted by Jonathan Gorin/R2/USEPA/US]

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: Follow-up to yesterday's meeting.  
**Date:** Wednesday, September 12, 2012 2:07:01 PM


---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

ok, thanks for clearing that up.

I saw it was mailed to Gwen, so i asked Anne to try to track it down, she found it. Problem solved. (I like Anne).

jon

 "McGowan, Carrie" ---09/12/2012 01:59:05 PM---Yes - the complete draft RI text was provided with highlighted changes for the Ditch work and the ta

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/12/2012 01:59 PM  
Subject: RE: Follow-up to yesterday's meeting.

---

Yes - the complete draft RI text was provided with highlighted changes for the Ditch work and the tables and drawings for the ditch work were included. It isn't really a completely revised RI because it doesn't address comments raised by EPA and NJDEP on the RI report and doesn't include everything (tables and figures) in the original RI. However that is the version I would send to NJDEP because it does have the results of the ditch work. I just wanted to make it clear that once we are done with the back and forth on all the RI comments we will issue a revised RI.

C

---

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Wed 9/12/2012 9:48 AM  
**To:** McGowan, Carrie  
**Subject:** RE: Follow-up to yesterday's meeting.

Carrie, the ditch stuff is in the December 2011 RI version - right? i think it's all highlighted or something.

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>  
Date: 09/12/2012 09:37 AM  
Subject: RE: Follow-up to yesterday's meeting.

---

Just a few notes on your email.

The ditch sampling information went to you as inserts to the RI - we didn't issue a revised RI yet but we could certainly send the package we sent you to NJDEP. There was text inserts, data tables, and drawings. I am not sure what you mean by the Dec. 11 RI. We can provide Anne with a copy of whatever she needs.

I don't have anything else really to add. I thought the meeting went well. Everyone seemed to come ready to participate.

Thanks,

Carrie

---

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]

**Sent:** Wed 9/12/2012 9:03 AM

**To:** McGowan, Carrie; David McNichol

**Subject:** Follow-up to yesterday's meeting.

Dave, Carrie, i'm not sure what happened yesterday, but when things work out well sometimes it's best not to ask too many questions.

Here's a really brief summary, please let me know if i missed anything (i'm also checking with Diana).

EPA and DEP are ok with the alternatives presented in the FS. However, some outstanding issues need to be addressed in the RI/FS and BERA.

- 1) Is the Hg contamination in the bedrock layer from GAF? (David, Diana)
- 2) ISP/Ashland want the Class IIIB criteria (i.e., surface water criteria) to be applicable at the "point of compliance" by which they mean the monitoring wells closes to the Arthur Kill. Wording needs to be prepared that is acceptable to all parties (Jon).
- 3) BTAG asked for some additional animal models to be used in the BERA. Also BTAG suggested that the PRPs assume the heron consumes a relatively higher percentage of fiddler crabs vs mummichog. This will cost the PRPs \$, so if it's unnecessary they'd rather not do it. (Mindy, Nancy)
- 4) Latest version of the RI report with the off-site ditch data needs to be forwarded to DEP. (Jon or Scott)
- 5) DEP was concerned that the sampling of SBC ended at the bulkhead. The ROD needs to contain text making it clear the actions required to implement the ROD do not mean the PRPs are no longer responsible for future actions in the Arthur Kill, etc, etc. (Jon)

Also, unrelated to this site, I will try to get the Piles Creek data from NOAA and provide it to you and DEP.

I still need Lora's ok with the latest FS changes (the COPCs especially) and need BTAG's response to #3 above. Once I get that, I'll edit the latest round of draft RI, FS and BERA comments to remove points I think we agreed on yesterday (arsenic for example) and send them as final.

Oh, one last thing, did Scott send the Dec 2011 RI to Frank F or anyone else at DEP? If so, Anne may be able to track it down.

jon



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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: Follow-up to yesterday's meeting.  
**Date:** Wednesday, September 12, 2012 9:48:31 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

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 "McGowan, Carrie" ---09/12/2012 09:37:56 AM---Just a few notes on your email. The ditch sampling information went to you as inserts to the RI -

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>  
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Thanks,  
Carrie

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**To:** McGowan, Carrie; David McNichol  
**Subject:** Follow-up to yesterday's meeting.

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jon

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [John M. Hoffman](#)  
**Subject:** RE: FS comments  
**Date:** Thursday, February 07, 2013 5:27:53 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "John M. Hoffman" <jmhoffman@ashland.com>

Ok, no rush, i doubt it's going anywhere.

 "McGowan, Carrie" ---02/07/2013 05:23:06 PM---No word back yet on the rogue tank. I reached out to Phillips 66 earlier this week but heard nothin

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, "John M. Hoffman" <jmhoffman@ashland.com>  
Date: 02/07/2013 05:23 PM  
Subject: RE: FS comments

---

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C

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Thursday, February 07, 2013 5:11 PM  
**To:** McGowan, Carrie; John M. Hoffman  
**Subject:** FS comments

Hi John and Carrie, apparently the meeting with DEP went well.

The final FS comment letter is awaiting my branch chief's signature. I'm not sure she'll get to it tonight, and i'm not in the office tomorrow, so i figured i'd e-mail you the comments now.

None of these should be a surprise, nor do i believe they will be difficult to address. If Gary has questions, or wants to check on a response before making a revision, that's fine of course.

Also, the draft revisions Cornerstone has already sent me (e.g., New Section 2.6, revised 2.3 etc) are acceptable except for the following, which again shouldn't be a surprise:

COPCs: The list of COPCs does not include all COPCs carried through the HHRA (RAGS Part D, Table 10s). Please ensure that ALL identified COPCs from the risk assessments are included as COPCs in the FS. Additionally, arsenic in sediment also posed an unacceptable human health risk.

I'll try to get you the final RI comments next week, followed by the Off Site Ditch approval letter.

Jon

ps, any word on that fiberglass tank?

---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: FS hard copy  
**Date:** Tuesday, July 10, 2012 9:06:58 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Thanks, his info is below.

Edwin F. Barth, Ph.D, P.E., C.I.H., R.S.  
Office of Research and Development  
U.S. Environmental Protection Agency  
26 W. Martin Luther King Drive  
Cincinnati, OH 45268  
Telephone: (513)-569-7669  
Fax: (513)-569-7158  
E-mail: [barth.ed@epa.gov](mailto:barth.ed@epa.gov)

 "McGowan, Carrie" ---07/10/2012 08:59:26 AM---Jon, I do not have an extra copy but I am happy to have one sent to him.

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 07/10/2012 08:59 AM  
Subject: RE: FS hard copy

---

Jon,

I do not have an extra copy but I am happy to have one sent to him. Cornerstone can send it to him ( I can't print the bigger maps). Please just send me his name and address and we will get one over to him. I have to have a hard copy myself – I am not good at reading the electronic versions.

Good to see you too. I found that meeting very interesting.

Carrie

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Tuesday, July 10, 2012 8:16 AM  
**To:** McGowan, Carrie  
**Subject:** FS hard copy

Carrie, good seeing you yesterday.

Would you have an extra hard copy of the draft FS? The ORD person who advised me on solidification has taken an interest in the site. He would like a hard copy rather than the electronic. He's been very helpful lately, and is a lot cheaper (free right now) than CDM.

thanks, jon

---

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**otherwise legally protected. If you are not the intended recipient, please do not distribute this e-mail. Instead, please delete this e-mail from your system, and notify us that you received it in error. No waiver of any applicable privileges or legal protections is intended (and nothing herein shall constitute such a waiver), and all rights are reserved.**

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Subject:** Re: FW: LCP HHRA  
**Date:** Tuesday, May 29, 2012 1:37:20 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

I just got the FS comments from DEP. They're dated 5/15, not sure what took it so long to come in, but they're here.

I'll send them to you once i go through them.

jon



**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](mailto:McGowan.Carrie)  
**Cc:** [DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)  
**Subject:** Re: FW: LCP Monitoring Plan Transmittal  
**Date:** Wednesday, January 25, 2012 3:02:40 PM

---

To: "McGowan, Carrie" <CMcGowan@ispcorp.com>

Cc: DMcNichol@ashland.com

Yes, thanks very much.

☐ "McGowan, Carrie" ---01/25/2012 02:55:12 PM---Jon, I believe this is what you are looking for. If not let me know.

From: "McGowan, Carrie" <CMcGowan@ispcorp.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "McNichol, David" <DMcNichol@ashland.com>  
Date: 01/25/2012 02:55 PM  
Subject: FW: LCP Monitoring Plan Transmittal

---

Jon,  
I believe this is what you are looking for. If not let me know.  
Thanks,  
Carrie

---

**From:** Thorn, Paul [<mailto:PThorn@BrwnCald.com>]  
**Sent:** Wed 1/25/2012 2:43 PM  
**To:** McGowan, Carrie  
**Subject:** RE: LCP Monitoring Plan Transmittal

A file has been sent to you via the [YouSendIt](#) File Delivery Service.

Download the file - [Site\\_Monitoring\\_Plan\\_December\\_2009.pdf](#)

Your file will expire after 14 days.

I believe this is what you are looking for. If not, feel free to give me a call.

-Paul

**Paul Thorn**  
Senior Scientist  
Brown and Caldwell | Allendale, NJ  
[PThorn@brwnCald.com](mailto:PThorn@brwnCald.com)  
T 201.574.4754 | C 201.803.1869



**From:** McGowan, Carrie [<mailto:CMcGowan@ispcorp.com>]  
**Sent:** Wednesday, January 25, 2012 2:28 PM  
**To:** Thorn, Paul  
**Subject:** RE: LCP Monitoring Plan Transmittal

Paul,  
Would it be possible for you to send me a pdf of the final plan that went in.  
Thanks,  
C

**From:** Thorn, Paul [<mailto:PThorn@Brwncald.com>]  
**Sent:** Wednesday, January 06, 2010 10:07 AM  
**To:** McGowan, Carrie  
**Subject:** LCP Monitoring Plan Transmittal

Carrie,

I got your phone message, the date of the transmittal is December 1, 2009. I've attached it for your reference.

-Paul

Paul Thorn  
Brown and Caldwell  
110 Commerce Dr.  
Allendale NJ, 07401  
(201) 574-4700



---

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Fw: LCP Status  
**Date:** Monday, November 05, 2012 7:58:13 AM

---

thanks for responding to Anne.

I'm shocked that leaning power line pole didn't go down.

-----"David McNichol" <[DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)> wrote: -----

To: Jonathan Gorin/R2/USEPA/US@EPA  
From: "David McNichol" <[DMcNichol@ashland.com](mailto:DMcNichol@ashland.com)>  
Date: 11/05/2012 07:52AM  
Subject: Fw: LCP Status

----- Forwarded by David McNichol/Wayne/Ashland on 11/05/2012 07:52 AM -----

From: David McNichol/Wayne/Ashland  
To: "Pavelka, Anne" <[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)>,  
Cc: Carrie McGowan/Wayne/ISPCORP@ISP, Jonathan Gorin <[Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)>, pthorn@brwnclad.com  
Date: 11/02/2012 12:50 PM  
Subject: Re: LCP Status

---

Anne

A brief drive through of the LCP site was accomplished this morning. Nothing particularly significant was observed. It was noted that a few more block have collapsed from the cell building (which has been slowly and steadily occurring), tires were washed about from a pile in a train shed and fencing is damaged and down along a portion of the southern rail line. We'll get the fence repaired ASAP.

Any questions let me know.

Best

Dave

-----"Pavelka, Anne" <[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)> wrote: -----

To: Carrie McGowan/Wayne/ISPCORP@ISP, Jonathan Gorin <[Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)>  
From: "Pavelka, Anne" <[Anne.Pavelka@dep.state.nj.us](mailto:Anne.Pavelka@dep.state.nj.us)>  
Date: 11/01/2012 09:06AM  
Cc: David McNichol/Wayne/Ashland@Ashland  
Subject: LCP Status

Hi

Hope you made it through the storm ok.

Could you send me a status update on the site as a result of Sandy?

Thanks

Anne

Anne Pavelka, PG, CHMM

Case Manager

New Jersey Department of Environmental Protection

Bureau of Case Management

P.O. Box 420

Mail Code 401-05F

Trenton, NJ 08625

609-292-3007

Anne.Pavelka@dep.state.nj.us

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Fw: LCP: RTC from Lora Smith  
**Date:** Wednesday, October 03, 2012 3:24:10 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

Dave, those responses are fine.

jon

 "David McNichol" ---10/03/2012 10:47:20 AM---Jon Preliminarily please take a look at these comments/corrections and let me

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 10/03/2012 10:47 AM  
Subject: Fw: LCP: RTC from Lora Smith

---

Jon

Preliminarily please take a look at these comments/corrections and let me know your thoughts.

Best

Dave

----- Forwarded by David McNichol/Wayne/Ashland on 10/03/2012 10:45 AM -----

From: "MacMillin, Scott" <SMacMillin@Brwncald.com>  
To: Carrie McGowan/Wayne/ISPCORP@ISP, David McNichol/Wayne/Ashland@Ashland,  
Cc: "Thorn, Paul" <PThorn@Brwncald.com>, "DiPippo, Gary" <Gary.DiPippo@Cornerstoneeg.com>  
Date: 10/03/2012 09:39 AM  
Subject: LCP: RTC from Lora Smith

---

Carrie and Dave,

Paul and I have responded to the comments with Redline in the text.

**Scott MacMillin, P.G.**

Managing Hydrogeologist  
Brown and Caldwell

Suite 2A  
2 Park Way

Upper Saddle River, NJ 07458-2345

[SMacMillin@brwncald.com](mailto:SMacMillin@brwncald.com)

T 201.574.4711 | M 201.841.0350



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[attachment "IN-LS\_ditch comments-EPA(100112)BC-REDLINE.docx" deleted by  
Jonathan Gorin/R2/USEPA/US]

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Cc:** [Carrie McGowan](#)  
**Subject:** Re: Fw: RE: Lora Smith's comments  
**Date:** Tuesday, October 02, 2012 2:14:02 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

Cc: "Carrie McGowan" <CMcGowan@ashland.com>

Dave, Carrie, i agree on IGW. Let me check with Lora on the COPCs....

jon

 "David McNichol" ---10/02/2012 01:38:22 PM---Jon take a look at this preliminarily before we finalize.  
Best Dave -----Forwarded by David M

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "Carrie McGowan" <CMcGowan@ashland.com>  
Date: 10/02/2012 01:38 PM  
Subject: Fw: RE: Lora Smith's comments

---

Jon

take a look at this preliminarily before we finalize.

Best

Dave

-----Forwarded by David McNichol/Wayne/Ashland on 10/02/2012 01:32PM -----

To: David McNichol/Wayne/Ashland@Ashland  
From: "DiPippo, Gary" <Gary.DiPippo@Cornerstoneeg.com>  
Date: 10/02/2012 12:17PM  
Cc: "smacmillin@brwncald.com" <smacmillin@brwncald.com>, Carrie McGowan/Wayne/ISPCORP@ISP,  
"Nemesh, Joseph" <Joseph.Nemesh@Cornerstoneeg.com>  
Subject: RE: Lora Smith's comments

Dave,

Below, for your consideration, are some thoughts on two of the specific comments.

Specific Comment No. 2 Regarding COPCs:

As noted in the text regarding the COPCs, COPCs were selected on the basis of being key risk drivers by medium or frequently detected. There are a number of constituents that exceed comparative standards or guidance levels, but are not risk drivers, are co-located with risk drivers, are infrequently detected, are present naturally, or are associated with the anthropogenic fill. Including all of these other constituents would clutter the analysis and would not affect the ability to evaluate the alternatives. That is, having the full suite of COPCs regardless of the mitigating factors noted here will not change the site risks or problem formulation or the alternatives. This is not dissimilar to

the discussion at the September 11, 2012 meeting regarding the food chain modeling comment for the BERA. This is work that takes time and money, but does not change anything.

Specific Comment No. 3 Regarding IGW PRGs:

The reason why the IGW PRGs are provided only for information is explained in the soils section of the PRG discussion. Among the factors (CEA as part of a presumptive remedy associated with fill, anthropogenic fill, actual groundwater data), most important is that actual groundwater data exists, so speculating about potential impacts from anthropogenic fill and site related releases on the basis of soil IGW numbers is irrelevant (consider also that the NJDEP has mentioned that the IGW guidance is in need of further evaluation). The site data also indicate why the IGW values should not be included as PRGs, particularly for the principal contaminant at the site – mercury. The NJDEP mercury IGW value is 0.1 mg/kg. At the site, mercury is visible in soils, and yet is largely absent from groundwater. Similar to the COPCs discussion above, if a chemical by chemical discussion needs to be prepared for the IGW guidance values, whether as a response to comment or in the FS report, it will take time and money, will not add anything to the analyses and in fact may detract, and will not change anything in the way of the alternatives analysis.

We hope this is useful in continuing the dialog with the USEPA as suggested in the e-mail below.

Please let us know if we can be of further assistance.

Gary J. DiPippo, P.E.

Cornerstone Environmental Group, LLC

90 Crystal Run Road

Suite 201

Middletown, NY 10941

845-695-0251

845-692-5894 (fax)

973-809-2581 (cell)

[gary.dipippo@cornerstoneeg.com](mailto:gary.dipippo@cornerstoneeg.com)

**From:** David McNichol [<mailto:DMcNichol@ashland.com>]

**Sent:** Monday, October 01, 2012 9:55 AM

**To:** DiPippo, Gary; [smacmillin@brwncald.com](mailto:smacmillin@brwncald.com)

**Subject:** Fw: Lora Smith's comments

For your consideration!

----- Forwarded by David McNichol/Wayne/Ashland on 10/01/2012 09:53 AM -----

From: Jonathan Gorin <[Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)>

To: David McNichol/Wayne/Ashland@Ashland, Carrie McGowan/Wayne/ISPCORP@ISP,

Date: 09/27/2012 04:31 PM

Subject: Lora Smith's comments

---



Dave, Carrie Lora just sent me some comments on the additional language for the off-property ditches.

So, here are her comments on the FS proposed changes as well as the new language for the ditch (as it appears in the Dec 2011 RI version). If any of these are going to cause big issues, please let me know so we can discuss before i send them final.

Still waiting on Diana/Van Eck.

jon

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](mailto:David.McNichol@ashland.com)  
**Cc:** [SMacMillan@brwncald.com](mailto:SMacMillan@brwncald.com)  
**Subject:** Re: Fw: YouSendIt File Delivery Notification  
**Date:** Monday, October 01, 2012 8:38:41 AM

---

To: "David McNichol" <DMcNichol@ashland.com>

Cc: SMacMillan@brwncald.com

Thanks, sorry about that Scott. I was checking my notes and realized i promised to forward it. Notes don't work if you don't check them.

 "David McNichol" ---10/01/2012 08:37:23 AM---You bet. Scott..... From: Jonathan Gorin  
<Gorin.Jonathan@epamail.epa.gov>

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, SMacMillan@brwncald.com  
Date: 10/01/2012 08:37 AM  
Subject: Re: Fw: YouSendIt File Delivery Notification

---

You bet. Scott.....

From: Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>  
To: David McNichol/Wayne/Ashland@Ashland,  
Date: 10/01/2012 08:18 AM  
Subject: Re: Fw: YouSendIt File Delivery Notification

---

I didn't - could you ask Scott to kindly repost it, as the time has lapsed.

thanks, jon

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/28/2012 05:11 PM  
Subject: Re: Fw: YouSendIt File Delivery Notification

---

Jon

Did not. Thought you would.

Best for a gud weekend

Dave

-----Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov> wrote: -----  
To: David McNichol/Wayne/Ashland@Ashland

From: Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>  
Date: 09/28/2012 04:14PM  
Subject: Re: Fw: YouSendIt File Delivery Notification

Dave, did you send the below to DEP?

jon

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/14/2012 02:46 PM  
Subject: Fw: YouSendIt File Delivery Notification

---

Sorry

Might work if I spell your name correctly!

Best

-----Forwarded by David McNichol/Wayne/Ashland on 09/14/2012 02:44PM -----

To: gorin.jonatan@epamail.epa.gov  
From: David McNichol/Wayne/Ashland  
Date: 09/14/2012 02:33PM  
Cc: Carrie McGowan/Wayne/ISPCORP@ISP  
Subject: Fw: YouSendIt File Delivery Notification

Jon

See below for the link to the presentation material from Tues. Good meeting and site visit. I'll call you sometime next week.

Best

Dave

-----Forwarded by David McNichol/Wayne/Ashland on 09/14/2012 02:30PM -----

To: David McNichol/Wayne/Ashland@Ashland  
From: Scott MacMillin <delivery@yousendit.com>  
Date: 09/14/2012 09:39AM  
Subject: YouSendIt File Delivery Notification



Dave,  
I have attached links to the the following PowerPoint presentations that were provided at the meeting with USEPA and NJDEP on 9/11/12:  
1. Remedial Investigation - Brown and Caldwell  
2. Risk Assessments - Geosyntec  
3. Feasibility Study - Cornerstone Environmental Group  
Please contact me with any further questions or comments.  
Scott MacMillin



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**From:** [Gorin\\_Jonathan@epamail.epa.gov](mailto:Gorin_Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Fw: YouSendIt File Delivery Notification  
**Date:** Monday, September 17, 2012 8:59:49 AM

---

To: "David McNichol" <DMcNichol@ashland.com>

thanks Dave,

 "David McNichol" ---09/14/2012 02:46:26 PM---Sorry Might work if I spell your name correctly! Best -----Forwarded by David McNichol/Wayne/

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/14/2012 02:46 PM  
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From: David McNichol/Wayne/Ashland  
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Dave

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**From:** [Gorin\\_Jonathan@epamail.epa.gov](mailto:Gorin_Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Fw: YouSendIt File Delivery Notification  
**Date:** Friday, September 28, 2012 4:14:56 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

Dave, did you send the below to DEP?

jon

 "David McNichol" ---09/14/2012 02:46:26 PM---Sorry Might work if I spell your name correctly! Best -----Forwarded by David McNichol/Wayne/

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 09/14/2012 02:46 PM  
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**To:** [David McNichol](#)  
**Subject:** Re: Fw: YouSendIt File Delivery Notification  
**Date:** Monday, October 01, 2012 8:18:19 AM

---

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Jonathan Gorin <Gorin.Jonat

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
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From: Scott MacMillin <delivery@yousendit.com>  
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**Brown** AND  
**Caldwell**

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [David McNichol](#)  
**Subject:** RE: LCP meeting with DEP  
**Date:** Wednesday, July 18, 2012 10:41:45 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "David McNichol" <DMcNichol@ashland.com>

Ok.

on another matter, I heard back from BTAG yesterday. They will try to send me a memo today. apparently there are some outstanding issues that still need to be rectified on the BERA. I think i know what they are, and if i'm right, it shouldn't be a problem. I'll let you know when i see the memo.

jon

 "McGowan, Carrie" ---07/18/2012 10:37:30 AM---Jon, September 7 or 14 are good. 25 is not.

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "David McNichol" <DMcNichol@ashland.com>  
Date: 07/18/2012 10:37 AM  
Subject: RE: LCP meeting with DEP

---

Jon,  
September 7 or 14 are good. 25 is not.  
We will be sending you a draft letter on the issue shortly.  
C

---

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Mon 7/2/2012 3:39 PM  
**To:** McGowan, Carrie  
**Cc:** David McNichol  
**Subject:** LCP meeting with DEP

Carrie, Dave, DEP cannot meet until Sept. Here's the dates they have open: Sept 7, 14 and 25

Any preference?

jon

---

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**From:** [McNichol, David](#)  
**To:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**Cc:** [Toft, Dennis M.](#)  
**Subject:** RE: Modification of CO  
**Date:** Monday, May 15, 2006 9:44:05 AM

---

Jon I agree it's on their respective plates. Dave

-----Original Message-----

From: Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
Sent: Monday, May 15, 2006 8:50 AM  
To: McNichol, David  
Subject: Fw: Modification of CO

Good morning Dave, rather than you and I trying to decipher and discuss info from the respective attorneys, perhaps it best to just let them talk directly.

If you're ok with this, EPA's attorney for this site is Muthu Sundrum, your lawyers can reach him at (212) 637-3148

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 05/15/2006 08:46 AM -----

Carrie McGowan  
<carrie-mes@comcast.net>  
To  
Jonathan Gorin/R2/USEPA/US@EPA  
05/11/2006 10:26 AM cc  
"McNichol, David"  
<DMcNichol@ispcorp.com>  
Subject  
FW: Modification of CO

Jon,  
From Dave.  
Carrie

From: McNichol, David [<mailto:DMcNichol@ispcorp.com>]  
Sent: Thursday, May 11, 2006 10:15 AM  
To: 'McGowan, Carrie'  
Subject: FW: Modification of CO

From: McNichol, David  
Sent: Wednesday, May 10, 2006 3:15 PM  
To: [gorin.jonathin@epamail.epa.gov](mailto:gorin.jonathin@epamail.epa.gov)  
Cc: 'Toft, Dennis M.'; Wills, Celeste  
Subject: Modification of CO

Jon

This email is a formal request for USEPA assistance in modifying the CO to include appropriate new provisions to allow and facilitate ISP's recovery of costs and future contribution claims from other PRPs. Given the recent court rulings ISP would desire more specific provisions facilitating the above mentioned. Dennis Toft, ESQ. Wolff and Samson will be coordinating on ISP's behalf.

Should you have any questions please contact me.

Thank you  
Dave

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: Permitting question  
**Date:** Monday, October 22, 2012 11:25:09 AM

---

To: "McGowan, Carrie" <cmcgowan@gaf.com>

thanks, thought so but wanted to confirm.

 "McGowan, Carrie" ---10/22/2012 11:01:44 AM---We put down ISP. C

From: "McGowan, Carrie" <cmcgowan@gaf.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA, Frank Cardillo/R2/USEPA/US@EPA  
Cc: David McNichol <DMcNichol@ashland.com>  
Date: 10/22/2012 11:01 AM  
Subject: RE: Permitting question

---

We put down ISP.

C

**From:** Gorin.Jonathan@epamail.epa.gov [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Monday, October 22, 2012 8:23 AM  
**To:** Cardillo.Frank@epamail.epa.gov  
**Cc:** McGowan, Carrie; David McNichol  
**Subject:** Fw: Permitting question

Dave, Carrie, who do you put down as generator when you send stuff off-site?

jon

----- Forwarded by Jonathan Gorin/R2/USEPA/US on 10/22/2012 08:21 AM -----

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 10/19/2012 04:07 PM  
Subject: Re: Permitting question

---

Jon,

In the process of reviewing the AOC internally. The question came up with respect to the following statement in paragraph 27 on page 7. Can you please help me answer it?

"Praxair shall be the designated generator for all materials leaving the Site with respect to work conducted by Praxair."

Typically Praxair lists the property owner's name as the generator because with pipeline work Praxair does not own the property. The property owner typically has a Generator USEPA ID# or a NJDEP generator ID: Praxair lists itself as the customer on the waste disposal form. Praxair does not have a problem covering the costs associated with the sampling and disposal.

Does the EPA have a number for the LCP site and is it possible to operate in this manner?  
Praxair does not want to be considered a generator.

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

**Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>**

10/16/2012 01:05 PM

To: Chuck\_Terbot@praxair.com  
CC: Frank Cardiello <Cardiello.Frank@epamail.epa.gov>  
Subject: Re: Permitting question

Chuck, for the remediation on-site we do not need NJDEP permits, we just need to show we're meeting what the permits would say ("permit equivalency"). Since your work is unrelated to the cleanup, I imagine you'd need the permits, but I'm not sure.

Frank, any idea?

jon

From: Chuck\_Terbot@praxair.com  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 10/16/2012 12:47 PM  
Subject: Permitting question

---

Hi Jon,

With respect to superfund site in NJ that is to be remediated. It is under EPA oversight. Do the NJDEP



waterfront development, wetlands, and other assorted permits still apply or do we operate on EPA directive based on our proposed and EPA approved workplans? If NJDEP permitting is applicable do we operate as normal with copy to you, or is there some other process?

regards,

Charles E. Terbot, PMP  
Project Manager: Pipeline & Metering  
Praxair, Inc.  
Office: 716.879.7603  
Cell: 716.553.8163  
175 East Park Drive  
Tonawanda, NY 14150-7891

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Sept 11 meeting  
**Date:** Thursday, August 30, 2012 2:49:19 PM

---

To: "David McNichol" <DMcNichol@ashland.com>

Dave, no problem, i was surprised you didn't ask when i first mentioned it.

i'm off tomorrow, have a pleasant weekend.

jon

 "David McNichol" ---08/30/2012 02:44:01 PM---Jon Not trying to be "over-the-line" just thought it might be stimulating to

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 08/30/2012 02:44 PM  
Subject: Re: Sept 11 meeting

---

Jon

Not trying to be "over-the-line" just thought it might be stimulating to discuss.

Best

Dave

From: Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>  
To: David McNichol/Wayne/Ashland@Ashland,  
Date: 08/30/2012 02:36 PM  
Subject: Re: Sept 11 meeting

---

Dave, i haven't even shown the draft to Kim, and what i "proposed" as the remedy is a completely meaningless place holder at this point. i drafted it merely to make it easier to "officially draft" it when the FS is done and we weigh the alternatives vs. the 9 (well 7) criteria.

Once the FS is final and my management (and DEP) have had a chance to look at the presumably revised draft (and proposed remedy) i'll send you a copy of it..

If you want an example of an approved PRAP i can send one to you.

Kim is coming to the meeting, by the way.

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 08/30/2012 02:28 PM  
Subject: Re: Sept 11 meeting

---

Hey Jon

I think you said the other day that you have written the PRAP. Any chance for a "discussion" copy??

Best

Dave

From: Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>  
To: David McNichol/Wayne/Ashland@Ashland,  
Date: 08/27/2012 08:21 AM  
Subject: Sept 11 meeting

---

Hey Dave, i got your voice mail message. I have invited Kim, i'll let you know if she's coming.

-----  
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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Re: Sept 11 meeting  
**Date:** Thursday, August 30, 2012 2:36:34 PM

---


To: "David McNichol" <DMcNichol@ashland.com>

Dave, i haven't even shown the draft to Kim, and what i "proposed" as the remedy is a completely meaningless place holder at this point. i drafted it merely to make it easier to "officially draft" it when the FS is done and we weigh the alternatives vs. the 9 (well 7) criteria.

Once the FS is final and my management (and DEP) have had a chance to look at the presumably revised draft (and proposed remedy) i'll send you a copy of it..

If you want an example of an approved PRAP i can send one to you.

Kim is coming to the meeting, by the way.

 "David McNichol" ---08/30/2012 02:28:46 PM---Hey Jon I think you said the other day that you have written the PRAP. Any chance

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Date: 08/30/2012 02:28 PM  
Subject: Re: Sept 11 meeting

---

Hey Jon

I think you said the other day that you have written the PRAP. Any chance for a "discussion" copy??

Best

Dave

From: Jonathan Gorin <Gorin.Jonathan@epamail.epa.gov>  
To: David McNichol/Wayne/Ashland@Ashland,  
Date: 08/27/2012 08:21 AM  
Subject: Sept 11 meeting

---

Hey Dave, i got your voice mail message. I have invited Kim, i'll let you know if she's coming.

-----

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** RE: September LCP Meeting  
**Date:** Thursday, July 26, 2012 1:44:15 PM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Done. Thanks

☐ "McGowan, Carrie" ---07/26/2012 01:39:08 PM---Looks like the best date is Tuesday September 11.  
Lets pen that in. Carrie

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: "Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>  
Cc: Jonathan Gorin/R2/USEPA/US@EPA, "David McNichol" <DMcNichol@ashland.com>  
Date: 07/26/2012 01:39 PM  
Subject: RE: September LCP Meeting

---

Looks like the best date is Tuesday September 11. Lets pen that in.  
Carrie

---

**From:** Pavelka, Anne [<mailto:Anne.Pavelka@dep.state.nj.us>]  
**Sent:** Thu 7/26/2012 10:05 AM  
**To:** McGowan, Carrie  
**Cc:** 'Jon Gorin (Gorin.Jonathan@epamail.epa.gov)'; David McNichol  
**Subject:** September LCP Meeting

Carrie

All the dates that were proposed for the September meeting are still fine.

As we discussed, the NJDEP would like Ashland to make a presentation of the FS alternatives and discuss the pros and cons of each. A brief summary of the site history and distribution of contamination in the soil and ground water should be included since everyone may not be familiar with the site. The NJDEP can discuss the Class IIIB criteria, if necessary. Also, there should be a discussion of any specific issues related to agency comments that Ashland has received.

Let me know if you have any other issues.

Thanks

Anne

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Cc:** [Carrie McGowan](#)  
**Subject:** Re: status  
**Date:** Tuesday, December 18, 2012 9:20:08 AM

---


To: "David McNichol" <DMcNichol@ashland.com>

Cc: "Carrie McGowan" <CMcGowan@ashland.com>

Yes, i have a conf call at 10 (should be done by 10:30) and another at 1:00 (that will be longer).

other than that, i'm available

jon

 "David McNichol" ---12/18/2012 09:17:23 AM---you at the office? i'm on conference. need to talk to you. -----Gorin.Jonathan@epamail.epa.gov wr

From: "David McNichol" <DMcNichol@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "Carrie McGowan" <CMcGowan@ashland.com>  
Date: 12/18/2012 09:17 AM  
Subject: status

---

you at the office? i'm on conference. need to talk to you.

-----Gorin.Jonathan@epamail.epa.gov wrote: -----

To: Carrie McGowan/Wayne/ISPCORP@ISP  
From: Gorin.Jonathan@epamail.epa.gov  
Date: 12/18/2012 09:14AM  
Cc: David McNichol/Wayne/Ashland@Ashland  
Subject: status

I have a call with Diana and David Wed afternoon. Hope to get an official response to you out this week, if not it will have to wait until i return from vacation. Again, sorry for the slow pace.

jon

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Subject:** RE:  
**Date:** Wednesday, May 23, 2012 10:20:05 AM

---


To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

Might try that for breakfast tomorrow.

See my follow up e-mail. Sounds like Anne (with the e) is taking the reigns.

jon

 "McGowan, Carrie" ---05/23/2012 10:17:33 AM---They make an excellent kielbasa egg and cheese breakfast sandwich! I recommend it!

From: "McGowan, Carrie" <CMcGowan@ashland.com>  
To: Jonathan Gorin/R2/USEPA/US@EPA  
Cc: "McNichol, David" <DMcNichol@ashland.com>  
Date: 05/23/2012 10:17 AM  
Subject: RE:

---

They make an excellent kielbasa egg and cheese breakfast sandwich! I recommend it!

So I guess ann Charles is still involved. Hum

C

**From:** Jonathan Gorin [<mailto:Gorin.Jonathan@epamail.epa.gov>]  
**Sent:** Wednesday, May 23, 2012 10:10 AM  
**To:** McGowan, Carrie  
**Cc:** McNichol, David  
**Subject:**

Dave, Carrie thanks for meeting yesterday, hopefully we'll be able to finish up tomorrow - at least on the FS comments

Anne Pavelka sent me an e-mail yesterday with some comments from Ann Charles. Same old points on fill vs. site related contamination. In my response, i asked them to provide you assistance in developing alt GW criteria.

Ann Charles asked that you send your request for assistance to her, Anne and David Van Eck (e-mail addresses below). Please cc' me as well.

See you tomorrow,

jon

"Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>, "Van Eck, David" <david.vaneck@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>

ps, i picked up a sandwich at that Polish deli. Really good, and very cheap (at least compared to Manhattan)

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**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [David McNichol](#)  
**Subject:** Sept 11 meeting  
**Date:** Monday, August 27, 2012 8:21:18 AM

---

To: David McNichol <DMcNichol@ashland.com>

Hey Dave, i got your voice mail message. I have invited Kim, i'll let you know if she's coming.

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [David McNichol](#)  
**Subject:** status  
**Date:** Tuesday, December 18, 2012 9:13:56 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "David McNichol" <DMcNichol@ashland.com>

I have a call with Diana and David Wed afternoon. Hope to get an official response to you out this week, if not it will have to wait until i return from vacation. Again, sorry for the slow pace.

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Subject:** Tank  
**Date:** Monday, January 14, 2013 7:08:02 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Hey Carrie, i got your message this am (i was out Friday). I'm heading to Brick in a bit, but should be back here around 1:00 if you want to call.

jon

**From:** [Gorin.Jonathan@epamail.epa.gov](mailto:Gorin.Jonathan@epamail.epa.gov)  
**To:** [McGowan, Carrie](#)  
**Cc:** [McNichol, David](#)  
**Date:** Wednesday, May 23, 2012 10:10:25 AM

---

To: "McGowan, Carrie" <CMcGowan@ashland.com>

Cc: "McNichol, David" <DMcNichol@ashland.com>

Dave, Carrie thanks for meeting yesterday, hopefully we'll be able to finish up tomorrow - at least on the FS comments

Anne Pavelka sent me an e-mail yesterday with some comments from Ann Charles. Same old points on fill vs. site related contamination. In my response, i asked them to provide you assistance in developing alt GW criteria.

Ann Charles asked that you send your request for assistance to her, Anne and David Van Eck (e-mail addresses below). Please cc' me as well.

See you tomorrow,

jon

"Pavelka, Anne" <Anne.Pavelka@dep.state.nj.us>, "Van Eck, David" <david.vaneck@dep.state.nj.us>, "Charles, Ann" <Ann.Charles@dep.state.nj.us>

ps, i picked up a sandwich at that Polish deli. Really good, and very cheap (at least compared to Manhattan)